Wilra Farms - 120524 Checklist Supplement

May 24, 2012 Inspection:

We arrived at Wilra Farms at approximately 12:15PM and made contact with the dairy owner/operator Doug Harre. I told Harre that we were conducting unannounced inspections of livestock facilities in USEPA targeted watersheds and we needed to conduct a facility inspection of his dairy. Harre instructed us where to park, we donned sanitary footwear, and we met in the tank room of the parlor to complete the Livestock Facility Inspection Checklist. We toured the facility after completing the checklist and determining that no records for land application were available. The site plan map and photo pages should be used as a reference for the tour described below.

We walked the gravel lot south of the feed storage pad and I noted where it appeared water runoff from the pad occurs to the east. All feed was covered except for a small amount of brewers' grain that was recently delivered. I told Harre that the feed should be covered just as the stored hay and silage. We walked on the north side of the dry cow lot and it appears that precipitation from the gravel lot can cross the dry cow lot. However, it should be noted that the dry cow lot was exceptionally clean at the time of inspection. Next, we walked along the north side of the free stall barn, around the concrete manure pit on the west end, then back east along Locust Creek. I noted the exit of the storm water culvert shown in the site plan map that drains the field north of the free stall barn to the creek. I noted the solids that were washed south of the concrete storage pad west of the slurry store from the walkway and dry cow lot. I also noted the solids in the drainage swale southeast of the parlor from the lot west of the parlor and walkway. Both swales report to Locust Creek south of the slurry store. I then noted the parlor waste discharge east of the parlor to a ditch that carries storm water south from the gravel lot and feed storage pad to the north of the parlor. The ditch reports to Locust Creek. Harre told me that he has a sump in the parlor that is pumped to the ditch or to the holding pen pit. I told him that he needed to pump the parlor waste to the pit and permanently seal the pipe to the ditch. I then explained to Harre that he would receive a Violation Notice and provided him with the following; Subtitle E Regulations, Reporting Requirements for Livestock Waste Releases in Illinois, outline of our enforcement process, and my business card. I took photographs and left the facility at approximately 3:45PM.

Summary/Proposed Actions:

In summary, there were several violations of the Illinois Environmental Protection Act noted during the inspection. Noted violations of the Act include Sections stating in part pursuant to Section 12(a) "No person shall: Cause or Threaten or Allow the discharge of any contaminants into the environment so as to cause or tend to cause water pollution in Illinois", Section 12(d) "No person shall deposit any contaminants upon the land in such a place and manner so as to create a water pollution hazard", and Section 12(f) "No person shall cause, threaten or allow the discharge of any contaminant into the waters of the state without an NPDES permit".

Wilra Farms - 120524 Checklist Supplement

Wilra Farms should immediately consider the following:

- Cease pumping parlor waste to the ditch and direct the waste to the holding pen pit. The discharge pipe to the ditch should be permanently sealed and/or removed.
- Cover exposed brewer's grains on the feed pad to prevent infiltration by precipitation. Alternative to covering the feed would be the collection of all runoff containing any feed or nutrients exiting the pad and directing to a liquid waste handling structure.
- Divert clean storm water from crossing the open feedlots and/or walkway using curbing or tiles.
- Implement guttering for rooflines tributary to the open feedlots to minimize the volume of clean storm water managed as livestock waste.
- Contain wastewater from the open feedlot west of the parlor, walkway, and dry cow lot.
- Apply for an NPDES permit for Livestock Operations.